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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

HOPE MAGEE, individually and as
Successor in Interest to JACOREY
SHAW, deceased; PAUL SHAW,
individually and as Successor in Interest
to JACOREY SHAW, deceased,

Plaintiffs,

v.

ADAM CHRISTIANSON, in his official
capacity as SHERIFF-CORONER FOR
STANISLAUS COUNTY, and in his
individual capacity; BILL POOLEY, in
his official capacity as SHERIFF-
CORONER FOR TUOLUMNE
COUNTY, and in his individual
capacity; SUNG-OOK BAIK, M.D.;
FRANK LEYVA; RODNEY HOBBS;
OLIVER IMLACH; HUNTER
ANGELA A/K/A H.B. ANGELA;
JERRY LINDSEY; PATRICIA QUINN;
TIMOTHY MCCARTHY; ____ [NAME
REDACTED] ____; COUNTY OF
TUOLUMNE, a municipal entity; and
COUNTY OF STANISLAUS, a
municipal entity, and DOES 1-10,

CASE NO.: _____

COMPLAINT FOR DAMAGES

1. **42 U.S.C. § 1985 (Conspiracy to Violate Civil Rights)**
2. **42 U.S.C. § 1986 (Failure to Prevent Conspiracy to Violate Civil Rights)**
3. **42 U.S.C. § 1983 (Supervisory Liability for Civil Rights Violations)**
4. **42 U.S.C. § 1983 (Municipal Liability Based on Unconstitutional Failure to Train)**
5. **42 U.S.C. § 1983 (Based on Substantive Due Process Violations)**
6. **42 U.S.C. § 1983 (Based on Unconstitutional Denial of Medical Care)**
7. **42 U.S.C. § 1983 (Based on Unconstitutional Failure to Protect)**

1 inclusive,

2 Defendants.

DEMAND FOR JURY TRIAL

JURISDICTION AND VENUE

3
4
5
6 1. Jurisdiction is vested in this court under 28 U.S.C. § 1343(3)-(4) for
7 violations of the 1871 Civil Rights Enforcement Act, as amended, including 42 U.S.C.
8 § 1983 and 28 U.S.C. § 1331.

9 2. Venue is proper in the Eastern District of California under 28 U.S.C.
10 § 1391(a)-(b).

PARTIES

11
12 3. Plaintiffs HOPE MCGEE and PAUL SHAW (hereinafter referred to as
13 “Plaintiffs”) are, and at all relevant times herein were, residents of the County of Los
14 Angeles and State of California.

15 4. Plaintiffs HOPE MCGEE and PAUL SHAW, the surviving birth parents of
16 decedent JACOREY SHAW are Successors in Interest to decedent JACOREY SHAW,
17 and are entitled to bring certain causes of action herein alleged pursuant § 337.30 of the
18 California Code of Civil Procedure. (Attached hereto is a declaration designating HOPE
19 MCGEE and PAUL SHAW as Successors in Interest to JACOREY SHAW, furnished
20 herewith pursuant to § 337.32 of the California Code of Civil Procedure, and a true and
21 correct copy of the death certificate for JACOREY SHAW, will be furnished herewith
22 under separate cover pursuant at § 377.32 of the California Code of Civil Procedures.)

23 5. Upon information and belief, Defendant ADAM CHRISTIANSON is, and
24 at all relevant times mentioned herein was, a resident of Stanislaus County, California.
25 At all times relevant to the events referenced herein, ADAM CHRISTIANSON was
26 acting in his official capacity as SHERIFF/CORONER for the COUNTY OF
27 STANISLAUS, California. ADAM CHRISTENSON is sued in his individual and
28 official capacities.

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1 6. Upon information and belief, Defendant BILL POOLEY is, and at all
2 relevant times mentioned herein was, a resident of Tuolumne County, California. At all
3 times relevant to the events referenced herein, BILL POOLEY was acting in his official
4 capacity as SHERIFF/CORONER for the COUNTY OF TUOLOMNE, California. BILL
5 POOLEY is sued in his individual and official capacities.

6 7. Upon information and belief, Defendant SUNG-OOK BAIK, M.D. is, and at
7 all relevant times mentioned herein was, a resident of Stanislaus County, California. At
8 all times relevant to the events referenced herein, SUNG-OOK BAIK, M.D., a forensic
9 pathologist, was acting in the course and scope of his employment for the
10 STANISLAUS COUNTY SHERIFF-CORONER, and under the supervision of
11 SHERIFF-CORONER ADAM CHRISTIANSON.

12 8. Upon information and belief, Defendant FRANK LEYVA is, and at all
13 relevant times mentioned herein was, a resident of Stanislaus County, California. At all
14 times relevant to the events referenced herein, FRANK LEYVA was acting in the course
15 and scope of his employment as a Detective/Investigator with the STANISLAUS
16 COUNTY SHERIFF-CORONER and under the direct supervision of SHERIFF-
17 CORONER ADAM CHRISTIANSON and SUNG-OOK BAIK, M.D.

18 9. Upon information and belief, Defendant RODNEY HOBBS is, and at all
19 relevant times mentioned herein was, a resident of Tuolumne County, California. At all
20 times relevant to the events referenced herein, RODNEY HOBBS, a sworn peace officer,
21 was acting in the course and scope of his employment as a Detective/Investigator and
22 Deputy Coroner with the TUOLUMNE COUNTY'S SHERIFF/CORONER'S OFFICE,
23 and under the supervision of SHERIFF-CORONER BILL POOLEY.

24 10. Upon information and belief, Defendant OLIVER IMLACH is, and at all
25 relevant times mentioned herein was, a resident of Tuolumne County, California. At all
26 times relevant to the events referenced herein, OLIVER IMLACH, a sworn peace
27 officer, was acting in the course and scope of his employment as a
28 Detective/Investigator and Deputy Coroner with the TUOLUMNE COUNTY'S

1 SHERIFF/CORONER'S OFFICE, and under the supervision of SHERIFF-CORONER
2 BILL POOLEY.

3 11. Upon information and belief, Defendant HUNTER ANGELA, A/K/A H.B.
4 ANGELA (hereinafter "H.B. ANGELA") is, and at all relevant times mentioned herein
5 was, a resident of Tuolumne County, California. At all times relevant to the events
6 referenced herein, H.B. ANGELA, was acting in the course and scope of his employment
7 as a Warden for the Sierra Conservation Center and the California Department of
8 Corrections and Rehabilitation. (hereinafter "CDCR"). H.B. ANGELA is sued in his
9 individual capacity only.

10 12. Upon information and belief, Defendant JERRY LINDSEY is, and at all
11 relevant times mentioned herein was, a resident of Tuolumne County, California. At all
12 times relevant to the events referenced herein, JERRY LINDSEY, was acting in the
13 course and scope of his employment as a Warden for the Sierra Conservation Center and
14 the California Department of Corrections and Rehabilitation. (hereinafter
15 "CDCR"). JERRY LINDSEY is sued in his individual capacity only.

16 13. Upon information and belief, Defendant PATRICIA QUINN is, and at all
17 relevant times mentioned herein was, a resident of Tuolumne County, California. At all
18 times relevant to the events referenced herein, PATRICIA QUINN, was acting in the
19 course and scope of her employment as a Warden for the Sierra Conservation Center and
20 the California Department of Corrections and Rehabilitation. (hereinafter "CDCR").
21 PATRICIA QUINN is sued in her individual capacity only.

22 14. Upon information and belief, Defendant TIMOTHY MCCARTHY is, and at
23 all relevant times mentioned herein was, a resident of Tuolumne County, California. At
24 all times relevant to the events referenced herein, TIMOTHY MCCARTHY, was acting
25 in the course and scope of his employment as a Lieutenant for the Sierra Conservation
26 Center and the California Department of Corrections and Rehabilitation (hereinafter
27 "CDCR"), and was under the supervision of H.B. ANGELA, PATRICIA QUINN, and
28 JERRY LINDSEY. TIMOTHY MCCARTHY is sued in his individual capacity only.

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15.

[THIS SECTION REDACTED PURSUANT TO PROTECTIVE ORDER]

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16. Defendant COUNTY OF TUOLUMNE is, and at all relevant times mentioned herein was, a municipal entity or political subdivision of the United States, organized and existing under the laws of the State of California.

17. Defendant COUNTY OF STANISLAUS is, and at all relevant times mentioned herein was, a municipal entity or political subdivision of the United States, organized and existing under the laws of the State of California.

18. Plaintiffs are informed and believe that at all times relevant herein, that DOE DEFENDANTS 1-10, were employed in various capacities by the California Department of Corrections and Rehabilitation (hereinafter "CDCR"), and/or the COUNTY OF STANISLAUS, and/or the COUNTY OF TUOLOMNE, and, acted under color of law, and in the course and scope of their employment with the California Department of Corrections and Rehabilitation (hereinafter "CDCR"), and/or the COUNTY OF STANISLAUS, and/or the COUNTY OF TUOLOMNE.

19. Unless otherwise specified, all individual defendants are sued herein in both their official and individual capacities.

20. Plaintiffs are unaware of the true names and capacities, or counties of residence of those Defendants named herein as DOE Defendants. Plaintiffs will amend this Complaint to allege said Defendants' true names and capacities when that information becomes known to them. Plaintiffs are informed, believe, and thereon allege that these DOE Defendants are legally responsible and liable for the incident, injuries,

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and damages hereinafter set forth, and that each of said Defendants proximately caused the injuries and damages by reason of negligent, careless, deliberately indifferent, intentional, willful, or wanton misconduct, including the negligent, careless, deliberately indifferent, intentional, willful, or wanton misconduct in creating and otherwise causing the incidents, conditions, and circumstances hereinafter set forth, or by reason of direct or imputed negligence or vicarious fault or breach of duty arising out of the matters herein alleged. Plaintiffs will seek leave to amend this Complaint to set forth said true names and identities of the unknown named DOE Defendants when they are ascertained.

21. Plaintiffs are informed, believe, and thereon allege that at all times herein mentioned, each of the Defendants was the agent and/or employee and/or co-conspirator of each of the remaining Defendants, and in doing the things hereinafter alleged, were acting within the scope of such agency, employment, and/or conspiracy and with the permission and consent of other co-Defendants.

Relevant Tolling Information

22. This Complaint arises out of the death of Plaintiffs' son, Jacorey Shaw, who lost his life on September 6, 2018 while incarcerated at the Sierra Conservation Center. The events alleged in the Complaint concern allegations of a civil conspiracy involving the individual named defendants. The last overt act alleged in furtherance of this conspiracy occurred on April 1, 2019, and concerns the official certification of Mr. Shaw's death certificate. Facts related to the individual defendants' participation in the civil conspiracy alleged herein did not become known to Plaintiffs until March of 2021, and could not have been discovered sooner. Additionally, this action is brought under the authority of CRC Emergency Rule 9, which would operate to toll the limitations period for this action from April 6, 2020 until October 1, 2020.

FACTS COMMON TO ALL COUNTS

23. This Complaint arises out of the in-custody death of Plaintiffs' birth son, Jacorey Shaw, which occurred on Thursday September 6, 2018.

24. At approximately 12:22 p.m. on September 6, 2018, inmate Jacorey Shaw,

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26 years of age, was pronounced dead in the Triage and Treatment Area of the Sierra Conservation Center (“SCC”), a correctional institution organized and existing under the management authority of the California Department of Corrections and Rehabilitation (“CDCR”). Prior to that day, Jacorey Shaw had exhibited no serious health problems at any time in his 26 years, had never been hospitalized for any illness or injury, and, having recently passed a comprehensive physical examination, Mr. Shaw was one of the select inmates at the SCC who were deemed physically fit for the vigorous physical training involved in the first phase of an overall firefighter training program, which required the completion of an intense Physical Fitness Training (“PFT”) program, which was the precursor to a more advanced Fire Fighter Training (“FFT”) program which was offered to provide firefighter training to participating inmates at SCC.

25. For Jacorey Shaw, and the fellow inmates in his PFT class supervised by SCC Teacher/Coach Dennis Jordan-Curasi, September 6, 2018 was “test day”, which historically marked the final right of passage at the conclusion of the PFT program. The test day activities included approximately two and one-half hours of strenuous physical exercises, each of which, pursuant to the long standing requirements of the CDCR, were to be completed within specified periods of time, and were historically designed to require successful applicants to demonstrate a high level of physical aptitude in order to pass the test within the time periods specified by the CDCR.

26. Jacorey Shaw passed each of the arduous physical activities on his test, but at great cost. At approximately 11:08 a.m. that morning, Mr. Shaw collapsed and fell unconscious on a crowded basketball court several minutes after successfully completing the approximately two hours and thirty minutes of strenuous physical activities of the PFT. The ambient temperature during the duration of the test was over 90°F, and steadily rose during the duration of the testing period.

27. The training regimen for the PFT, which was directly supervised at all levels by teacher/coach Dennis Jordan-Curasi, had been in existence for the approximately two decades, and every aspect of the test day exercises were meticulously regimented, and

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1 contained specific physical activities to be undertaken by each participant at various
2 predetermined times throughout the duration of the testing, in a manner. However, on
3 this day, the test was different. It contained an additional exercise test, requiring
4 participants to jog an additional one-third of a mile at the very end of the test without rest
5 or water immediately after running a mile in under 9 minutes. Prior to this day, the “9
6 minute mile” had historically marked the end of the test, in a manner unchanged for
7 decades.

8 28. Towards the end of the test, Jacorey Shaw was beginning to exhibit the
9 objective symptoms of severe heat exhaustion, and his body was faltering. At the onset
10 of the additional one-third of a mile jog, like all the other participants who had
11 successfully completed the test day training, Mr. Shaw had already been participating in
12 approximately two hours and thirty minutes of strenuous physical exertion in over 90
13 degree rising heat, and the ambient temperature in the testing area had reached between
14 ninety-five and 100 degrees towards the end of the testing period.

15 29. After having successfully completed the final additional lap of testing,
16 Jacorey Shaw was suffering from the advanced stages of a heat related illness, and was
17 suffering from a very serious medical emergency. Several minutes after the test was
18 finally over, having made his way to the basketball courts adjacent to the testing area,
19 Jacorey Shaw collapsed, pleading for water to anyone who would listen. Moments later,
20 he would lose consciousness, which he never regained.

21 30. Far from an accident, Mr. Shaw’s death was the predictable consequence of
22 several factors, each of which was the exclusive responsibility of the personnel at the
23 SCC who were entrusted with protecting the health and safety of the inmates under their
24 care, including Mr. Shaw. A few of the more significant factors that contributed to Mr.
25 Shaw’s preventable loss of life on the day of the incident are as follows:

26 **Prior to September 6, 2018**

27 31. Prior to September 6, 2018, SCC supervisors H.B. ANGELA, PATRICIA
28 QUINN, and/or JERRY LINDSAY and DOES 1-5 deliberately and recklessly failed to

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1 implement any form or training protocols to address the predictable and recurring danger
2 of heat related illnesses among SCC inmates, including the most fundamental protocols
3 mandated by the CDCR by actions and inactions which included, but were not limited to:

- 4 a. A complete lack of compliance with each and every aspect of the
5 implementation and maintenance CDCR's policies aimed at the prevention
6 of heat related injuries, heat related illness and/or heat stroke among at risk
7 inmates housed in the SCC;
- 8 b. A complete lack of compliance with each and every aspect of the
9 implementation and maintenance CDCR's policies aimed at the prevention
10 of heat related injury and illness in the PFT;
- 11 c. A complete lack of training of SCC personnel, including Teacher/Coach
12 Dennis Jordan- Curasi, regarding the existence of, implementation of, or
13 practical application of the CDCR's regulatory protocols to protect the
14 health and safety of SCC;
- 15 d. A complete lack of training of SCC personnel, including Dennis Jordan
16 Curasi, regarding the existence of, implementation of, or practical
17 application of the CDCR's regulatory protocols to protect the health and
18 safety of the SCC inmates in the PFT;
- 19 e. A deliberate failure to ensure any institution-wide safety measures aimed at
20 identifying, correcting, and preventing inmates' recurring and predictable
21 exposure to health hazards caused by heat related illnesses;
- 22 f. A deliberate failure to ensure any institution-wide safety measures aimed at
23 training SCC personnel regarding PFT inmates' recurring and predictable
24 exposure to health hazards caused by heat related illnesses;
- 25 g. Deliberately and consciously deciding to include an additional physical
26 exercise requirement at the conclusion of an approximate two and a half
27 hour workout on the testing day in Jacory Shaw's PFT class, in reckless
28 disregard of the potential heat related illnesses facing inmates required to

test in ambient temperatures of over ninety degrees.

On September 6, 2018

32. On the September 6, 2018 test day, Mr. Shaw participated in approximately two and one-half hours of strenuous physical activity, including an additional 1/3 mile jog, which comprised a longer and more arduous period of exercise than had ever been administered on a testing day in the PFT. Throughout the approximately two and one-half hour duration of the test day exercise period, the ambient temperature in the area where Mr. Shaw was performing his test day exercises was well over 90 degrees, and escalated throughout the duration of the test.

33. During the test, Mr. Shaw did not receive the most minimal levels of hydration necessary to sustain the arduous physical activities he was required to endure as a condition of passing the PFT.

34. As the strenuous workout regimen progressed on this day, Mr. Shaw began to exhibit the clear signs of a serious medical emergency caused by the combined effects of heat related illness coupled with dehydration, and this fact was readily apparent to any person who observed Mr. Shaw in the final stages of the test, including the SCC personnel, including, at a minimum, the Teacher/Coach Dennis Jordan Curasi who oversaw the PFT, [

[THIS SECTION REDACTED PURSUANT TO PROTECTIVE ORDER]

]

After September 6, 2018

35. Upon information and belief, pursuant to an express and/or implied agreement among INDIVIDUAL DEFENDANTS, and each of them, that was agreed upon and assented by each of the INDIVIDUAL DEFENDANTS prior to September 6, 2018, the INDIVIDUAL DEFENDANTS, engaged in an agreement to falsify, distort, and/or cover up the true circumstances surrounding the death of any inmate at the SCC

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and/or in the PFT that died as a result of a heat related illness or injury occurring on the premises of the SCC and under the supervision of CDCR personnel. This concerted effort manifested itself in the combined efforts of several INDIVIDUAL DEFENDANTS to classify Jacorey Shaw's death as a "natural" death, based on a nonexistent pre-existing heart disease, while deliberately ignoring, suppressing, and denying the existence of any and all evidence demonstrating that Mr. Shaw was exposed to the effects of approximately two and one-half hours of extreme physical exertion in extreme heat, and likely exhibited the effects of heat exhaustion, heat stroke, and/or any other form of heat related injury and illness. Pursuant to this conspiracy, the efforts of SCC supervisors H.B. ANGELA, PATRICIA QUINN, TIMOTHY MCCARTHY, and JERRY LINDSAY, each of whom acted in the course and scope of their employment with the CDCR as supervisors at the SCC included, but were not limited to deliberately failing to conduct any form of investigation of any inmate witnesses and/or SCC personnel concerning the physical condition of Mr. Shaw at any time before 11:08 a.m. on September 6, 2018, which is the moment in which Mr. Shaw collapsed unconscious several minutes after completing the final test of the PFT.

36. Sometime after September 6, 2018, all videotaped footage of events that occurred in the SCC training area went missing. It was either destroyed or not preserved in some manner. There exists, however, clear and perfectly preserved video evidence of events occurring after 11:08 a.m. in the SCC testing area, as well as the adjacent areas at the SCC, including the basketball courts where Mr. Shaw collapsed several minutes after he finished the PFT test. Upon information and belief, SCC supervisors H.B. ANGELA, PATRICIA QUINN, and/or JERRY LINDSAY and DOES 1-4 deliberately ordered, and/or caused to ordered, the destruction of any and all SCC video footage depicting events occurring in and around the testing area from 8:00 a.m. to 11:00 a.m., which was the time of Mr. Shaw's test. This footage would have undeniably captured Mr. Shaw in the final stages of his test, when he was probably exhibiting objective and obvious symptoms reflecting advanced stages of heat exhaustion or some other form of heat

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related illness. Upon information and belief, SCC supervisors H.B. ANGELA, PATRICIA QUINN, and/or JERRY LINDSAY ordered the destruction of this video evidence pursuant to an express or implied agreement which existed prior to September 6, 2018 to falsify, distort, and/or cover up the true circumstances surrounding the death of any inmate at the SCC and/or in the PFT that died as a result of a heat related illness or injury occurring on the premises of the SCC and under the supervision of CDCR personnel.

37. Upon information and belief, SCC supervisors H.B. ANGELA, PATRICIA QUINN, JERRY LINDSAY and DOES 1-5 deliberately failed to include, and/or deliberately ordered the exclusion of, any mention of the true circumstances surrounding Mr. Shaw's death in any internal CDCR investigation into the circumstances surrounding Mr. Shaw's death.

38. Upon information and belief, SCC supervisors H.B. ANGELA, PATRICIA QUINN, JERRY LINDSAY and DOES 1-5 deliberately falsified, altered, and/or fabricated documents, and/or deliberately ordered the falsification, alteration, and/or fabrication of documents which reflected evidence of the fact that the ambient temperature at the SCC testing area was over 90 degrees between the hours of 8:00 a.m. and 11:00 a.m., which is the time in which when Jacorey Shaw underwent the final testing of the PFT. Pursuant to this coordinated effort, SCC supervisors H.B. ANGELA, PATRICIA QUINN, JERRY LINDSAY and/or DOES 1-5 instructed, and or, ordered the instruction of employees to falsify, alter, and fabricate documents which reflected evidence of the fact that the ambient temperature at the SCC testing area was over 90 degrees between the hours of 8:00 a.m. and 11:00 a.m. on the morning of September 6, 2018, which is the time in which when Jacorey Shaw underwent the final testing of the PFT, and further ordered, and/or caused Teacher/Coach Dennis Jordan-Curasi to be ordered to falsely report that the ambient temperature in the testing area was less than 90 degrees during the testing period. At all times relevant to the events described herein, SCC supervisors H.B. ANGELA, PATRICIA QUINN, TIMOTHY MCCARTHY, and/or

JERRY LINDSAY had direct and actual knowledge of the fact that between the hours of 8:00 a.m. and 11:00 a.m. on the morning of September 6, 2018, which is the time in which when Jacorey Shaw underwent the final testing of the PFT, the ambient temperature in the PFT testing area rose to well over 90 degrees.

Lt. Timothy McCarthy Fabricates the Actual Temperature at the SCC to Cal/OSHA Inspector Raymond Smith

39. In documents first received by plaintiffs on or around the first week in March of 2021, plaintiffs learned, for the first time, that LT. TIMOTHY MCCARTHY, while acting in the course and scope of his employment with the CDCR and SCC, deliberately provided false and misleading information to an Inspector from the California Division of Occupational Safety and Health ("Cal/OSHA") regarding the ambient temperature at the SCC from the hours of approximately 8:30 a.m. and 11:00 a.m. on September 6, 2018, when Mr. Shaw underwent the final testing of the PFT. Specifically, in a document request sheet propounded by Cal/OSHA Inspector Raymond Smith, which specifically asked LT. TIMOTHY MCCARTHY, as a representative of the SCC, to provide documentation of the temperature at the SCC for the 14 day period preceding September 6, 2021, LT. TIMOTHY MCCARTHY provided reports, which purported to be from the National Weather Service, which reported the temperature on September 6, 2018 at 11:03 a.m. to be 84°F, rising to 85°F at 12:03 p.m. The documentation LT. TIMOTHY MCCARTHY provided to Cal/OSHA Inspector Raymond Smith was deliberately misleading, as these documents reported the temperature from the unincorporated area of Green Spring CA, which is approximately 21 miles from Jamestown, CA where the SCC is located. More significantly, the geographical elevation of Green Spring, CA is approximately 3136 feet, which is more than two times the geographical elevation of Jamestown, which is 1427 feet. With full knowledge of the fact that meteorologically speaking, temperatures cool at higher elevations, when LT. TIMOTHY MCCARTHY provided the temperature from Green Spring, and passed this off as being the temperature from Jamestown, he did so with the

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1 direct knowledge that a temperature reading from a location approximately 1427 feet
2 higher in elevation would yield a substantially lower temperature than would be obtained
3 from the actual location where Mr. Shaw died. In deliberately providing this fabricated
4 temperature reading to Cal/OSHA Inspector Raymond Smith, LT. TIMOTHY
5 MCCARTHY deliberately sought to obfuscate the true ambient temperature in the SCC
6 testing area on the morning of September 6, 2018, which LT. TIMOTHY MCCARTHY
7 knew was, in reality, well over 90°F. This was a deliberate and calculated attempt to
8 absolve SCC personnel from the legal and moral responsibility for exposing inmate
9 Jacorey Shaw to an unduly unsafe and hazardous period of prolonged physical exertion
10 in temperatures over 90°F which, in reality, is the real reason why Jacorey Shaw died.

11 40. Upon information and belief, when LT. TIMOTHY MCCARTHY
12 deliberately misled Cal/OSHA Inspector Raymond Smith by providing documents which
13 fabricated the true temperature at the SCC on the days requested by Cal/OSHA Inspector
14 Raymond Smith, he did so at the direction of, under the immediate supervision of, for the
15 benefit, and at the behest of supervisors H.B. ANGELA, PATRICIA QUINN, JERRY
16 LINDSAY, and DOES 1-5.

17 41. Upon information and belief, when LT. TIMOTHY MCCARTHY
18 deliberately misled Cal/OSHA Inspector Raymond Smith by providing documents which
19 fabricated the true temperature at the SCC on the days requested by Cal/OSHA Inspector
20 Raymond Smith, he did so pursuant to an express and/or implied agreement with
21 supervisors H.B. ANGELA, PATRICIA QUINN, JERRY LINDSAY, and DOES 1-5
22 to falsify, distort, and/or cover up the true circumstances surrounding the death of any
23 inmate at the SCC and/or in the PFT that died as a result of a heat related illness or injury
24 occurring on the premises of the SCC and under the supervision of CDCR personnel.

25 42. In a further effort to falsify, distort, and cover up the true circumstances
26 surrounding the death of Jacorey Shaw, LT. TIMOTHY MCCARTHY, repeatedly
27 referenced a “possible heart condition” in his description of a cause of Mr. Shaw’s death
28 in documents prepared by LT. TIMOTHY MCCARTHY for Cal/OSHA Inspector

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Raymond Smith. Upon information and belief, in falsely reporting a “possible heart condition” as the cause of Mr. Shaw’s demise, and deliberately failing to reference any possibility of a heat related illness and/or heat related injury as even being considered as a cause of Mr. Shaw’s death, LT. TIMOTHY MCCARTHY was acting based on information provided to him by RODNEY HOBBS and DR. SUNG-OOK BAIK of the STANISLAUS COUNTY OFFICE OF THE SHERIFF-CORONER, who, respectively would subsequently author and furnish falsely investigative data surrounding the sham autopsy report referenced herein.

43. Not surprisingly, on October 3, 2018, due to the multiple interwoven components of false, misleading, and fabricated information provided to him in connection with his investigation, Raymond Smith, in his capacity as Cal/OSHA Compliance Safety and Health Officer, issued a “NOTICE OF NO ACCIDENT-RELATED VIOLATION AFTER INSPECTION” regarding the September 6, 2018 incident at the Sierra Conservation Center, which found no violations of any CDCR safety protocols in connection with the the death of Jacorey Shaw. The sham autopsy report prepared by DR. SUNG-OOK BAIK, discussed in detail below, was signed by DR. SUNG-OOK BAIK one day earlier, on October 2, 2018. Upon information and belief, this demonstrates that prior to September 6, 2018, ALL INDIVIDUAL DEFENDANTS had a predetermined agreement to falsify, distort, and/or cover up the true circumstances surrounding the death of any inmate at the SCC who died as a result of a heat related illness or injury occurring on the premises of the SCC and under the supervision of CDCR personnel, which, in this instance, included Jacorey Shaw.

The Autopsy Report

44. In order to absolve themselves of the moral and legal responsibility for the fact that Jacorey Shaw’s death was directly and proximately caused by heat stroke and/or heat related illnesses, the individual defendants, working separately and in concert, engaged in a deliberate and concerted effort to falsify and distort Jacorey Shaw’s autopsy report, which was conducted by the STANISLAUS COUNTY OFFICE OF THE

1 SHERIFF-CORONER, which had, for consideration, contracted the COUNTY OF
2 TUOLUMNE to perform Jacorey Shaw's autopsy.

3 45. In connection with the investigation provided to/and or conducted by the
4 STANISLAUS COUNTY OFFICE OF THE SHERIFF-CORONER into the death of
5 Jacorey Shaw, TUOLOMNE COUNTY SHERIFF-CORONER Detective/Investigator
6 RODNEY HOBBS reported that Jacorey Shaw appeared physically fit and was doing
7 physical training on September 6, 2018 when he collapsed, further reporting that Mr.
8 Shaw "was jogging and collapsed within the prison training grounds appeared physically
9 fit and was doing physical training on September 6, 2018 when he collapsed". All of
10 these statements were entirely false, and when RODNEY HOBBS furnished this
11 information to the STANISLAUS COUNTY OFFICE OF THE SHERIFF-CORONER,
12 he did so deliberately with the specific intent of falsifying and misreporting the true
13 circumstances surrounding the death of Jacorey Shaw.

14 46. Pursuant to the terms of a prior contractual agreement, although Mr. Shaw
15 died in TUOLOMNE COUNTY, his autopsy was performed by DR. SUNG-OOK BAIK
16 of the STANISLAUS COUNTY OFFICE OF THE SHERIFF-CORONNER on
17 September 13, 2018. As will be thoroughly explored below, there are numerous autopsy
18 findings that are grossly misinterpreted and the entirety of DR. SUNG-OOK BAIK's
19 opinions and conclusions are completely lacking in any scientific foundation. This
20 erroneous autopsy report is based in part on the fact that there are numerous deficiencies
21 and glaring omissions surrounding Mr. Shaw's death investigation, which led to
22 erroneous conclusions in the autopsy report. As will be thoroughly explored below, for
23 these reasons, accepted medical protocols dictate that this autopsy falls below the
24 standard of care and does not meet the basic requirements as detailed in the National
25 Association of Medical Examiner's (NAME) Forensic Autopsy Performance Standards
26 and the NAME Accreditation Guidelines.

27 47. The autopsy report states that Jacorey Shaw was a well-developed, well
28 nourished man measuring 68 inches tall and weighing 190 pounds. DR. SUNG-OOK

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1 BAIK made no mention of Mr. Shaw being overweight or obese in his description of the
2 body.

3 48. According to the autopsy report, the heart was reported to be 425 grams.
4 The left ventricle was measured to be 1.5. cm in maximal thickness and the right
5 ventricle was measured to be 0.5 cm in maximum thickness. The inner one-third of the
6 left ventricular myocardium was described as pale when compared to the other areas of
7 the myocardium.

8 49. In sworn testimony given on March 3, 2021 and March 3, 2021, DR.
9 SUNG-OOK BAIK testified that he did not have an independent recollection of Mr.
10 Shaw's autopsy.

11 50. On September 13, 2018 DR. SUNG-OOK BAIK performed an autopsy on
12 the remains of Mr. Shaw without a full understanding of the circumstances associated
13 with the death of Jacorey Shaw. In his aforementioned sworn testimony, DR. SUNG-
14 OOK BAIK stated that he may have been provided some information by the police, but
15 did not make any notes regarding what he might have been told. DR. SUNG-OOK BAIK
16 additionally stated that he did not have any information about the temperature on the day
17 that Mr. Shaw died. Despite not knowing critical details about the circumstances of the
18 death, DR. SUNG-OOK BAIK conducted the autopsy and rendered opinions.

19 51. The following exchange took place during the sworn testimony of DR.
20 SUNG-OOK BAIK:

21 QUESTION: WOULD IT BE FAIR TO SAY THAT YOU DIDN'T RECEIVE
22 ANY INFORMATION ABOUT THE TEMPERATURE ON THE DAY THAT
23 MR. SHAW DIED?

24 ANSWER: THAT'S RIGHT.

25 QUESTION: AND WOULD IT BE FAIR TO SAY YOU DIDN'T RECEIVE
26 ANY INFORMATION ABOUT THE TEMPERATURE BECAUSE THE
27 SHERIFF DIDN'T PROVIDE YOU ANY INFORMATION ABOUT THE
28 TEMPERATURE ON THE DAY THAT MR. SHAW DIED?

1 ANSWER: THAT'S RIGHT.

2 52. When asked about heat-related deaths, DR. SUNG-OOK BAIK testified that
3 a "heat-related illness, this depends on the weather. If the weather is so hot, maybe we
4 consider that. If the weather is not hot, there is less possibility of hyperthermia." DR.
5 SUNG-OOK BAIK further testified that in order to determine if a death is heat-related,
6 he would need information regarding the weather.

7 53. With respect to the autopsy, DR. SUNG-OOK BAIK testified that
8 dehydration means dry skin. According to accepted medical protocols, this analysis is
9 overly simplistic and not useful to determine or rule out the existence of dehydration in a
10 decedent. According to accepted medical protocols, dry skin is a very subjective finding
11 and would not be an accurate way to determine dehydration in a case in which an
12 autopsy is performed seven days after a decedent's passing, such as was the case with the
13 autopsy of Jacorey Shaw.

14 54. In his sworn testimony, DR. SUNG-OOK BAIK testified that a forensic
15 pathologist could test, or cause to be tested, ocular fluid (also called "vitreous fluid") for
16 the presence of electrolytes. DR. SUNG-OOK BAIK could have ordered this test to
17 determine if Mr. Shaw was suffering from the effects of dehydration prior to his demise,
18 but deliberately chose not to.

19 55. Regarding the presence of urine in the bladder, accepted medical protocols
20 hold that, although non-specific, a lack of urine would be consistent with a diagnosis of
21 dehydration. In the autopsy report, DR. SUNG-OOK BAIK failed to describe whether
22 any urine was present in the bladder, in contravention of accepted medical protocols.

23 56. Mr. Shaw's remains arrived at the STANISLAUS COUNTY OFFICE OF
24 THE CORONER on September 10, 2018, and were weighed at 180 lbs. upon arrival.
25 Inexplicably, the autopsy report sets forth Mr. Shaw's weight at 190 lbs. DR. SUNG-
26 OOK BAIK, who set forth "obesity" as a contributing factor to Jacorey Shaw's death,
27 had no explanation as to why Mr. Shaw's weight was ten pounds heavier in the autopsy
28 report, as compared to his weight upon arrival at his office. Mr. Shaw's height and

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weight are reported differently in various records. The autopsy report indicates that a height and weight of 5'8 and 190 pounds. Records from the STANISLAUS COUNTY SHERIFF'S DEPARTMENT have Mr. Shaw's weight as 180 pounds and the Coroner Death Natural Report has Mr. Shaw at 5'10 and 183 pounds. A 5'8 man weighing 190 pounds would equate to a body mass index (BMI) of 28.9 and a 5'10 man weighing 180 pounds would equate to a BMI of 25.8. Accepted medical protocols hold that a BMI between 25.0 and 19.9 would not be classified as obese. According to accepted medical protocols, Jacorey Shaw was not obese when he died, and obesity did not cause or contribute to his death.

57. DR. SUNG-OOK BAIK proffered the opinion that Jacorey Shaw died from a fatal cardiac arrhythmia due to cardiomyopathy and he based this opinion on several autopsy findings. DR. SUNG-OOK BAIK reported that Mr. Shaw's heart was enlarged and that a heart weight of 425 grams was abnormal. DR. SUNG-OOK BAIK testified that a normal heart for Mr. Shaw would be 270 grams. Additionally, DR. SUNG-OOK BAIK reported that Mr. Shaw had left and right ventricular hypertrophy. DR. SUNG-OOK BAIK further reported that Mr. Shaw's left ventricle was 1.5 cm thick and the right ventricle was 0.5 thick. In his sworn testimony, DR. SUNG-OOK BAIK testified that a normal thickness of the left ventricular myocardium would be 1.2 cm, and that a normal thickness of the right ventricular myocardium would be 0.2-0.3 cm. According to accepted medical protocols, DR. SUNG-OOK BAIK's opinions regarding the heart are entirely lacking in scientific foundation, and are completely erroneous. According to accepted medical protocols, for Mr. Shaw, a heart weight of 425 grams would not be abnormal. Medical literature supports the conclusion that a 425 gram heart for a man of Mr. Shaw's height and weight would be completely normal. (*See* "Quantitative Anatomy of Human Heart", Mayo Clin. Proc., February 1988, Vol. 63). Accepted medical protocols hold that the high end of normal for the thickness of the left ventricle is 1.5 cm and the high end of normal for the thickness of the right ventricle is 0.5 cm. Hence, according to accepted medical protocols, Jacorey Shaw had a normal sized heart.

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58. In the autopsy report, DR. SUNG-OOK BAIK reported that the inner 1/3 of the left ventricular myocardium was pale. According to accepted medical protocols, this is a completely subjective finding, and could either represent a possible pathology or a completely normal finding. According to accepted medical protocols, microscopic slides of Mr. Shaw's heart tissue would definitively prove the existence or nonexistence of coronary heart disease or any other heart condition that may cause a myocardial infarction, in a manner that would become a permanent part of the scientific data supporting any conclusions regarding Mr. Shaw's autopsy findings. Although DR. SUNG-OOK BAIK could have easily ordered the creation of microscopic slides that would have definitively determined whether Mr. Shaw was in fact suffering from some form of preexisting heart condition prior to his death, in deliberate contravention of accepted medical protocols DR. SUNG-OOK BAIK deliberately failed to do so.

59. Upon information and belief, the reason DR. SUNG-OOK BAIK failed to order the creation of any microscopic slides of Mr. Shaw's heart tissue was due to the fact that such reliable scientific data would undermine and definitively disprove DR. SUNG-OOK BAIK's intentionally false conclusion that Jacorey Shaw's death was caused by a preexisting heart condition, an opinion which DR. SUNG-OOK BAIK knew was totally false and unsupportable by any form of reliable scientific data when he prepared and signed off on Mr. Shaw's autopsy report.

60. According to the accepted medical protocols as reflected in the NAME Accreditation Guidelines, it is standard practice to take photographs of the body as part of the autopsy procedure. DR. SUNG-OOK BAIK did not take, nor did he order any member of his staff to take, photographs of Mr. Shaw's body at any time during the autopsy. In his sworn testimony, DR. SUNG-OOK BAIK stated that photographs are only taken on homicides or deaths that are deemed "suspicious". This sworn testimony demonstrates that DR. SUNG-OOK BAIK had ruled out any suspicious circumstances prior to conducting the autopsy.

61. The Toxicology Requisition Form for Mr. Shaw's autopsy falsely indicates

1 that a drug overdose was “probable”, which was, in fact, quickly disproved. After
 2 receiving the toxicology results, which were negative for any controlled DR. SUNG-
 3 OOK BAIK issued the cause and manner of death, concluding that Mr. Shaw died of
 4 natural causes due to a preexisting heart condition. This was done despite not having
 5 even a partial understanding of the specific circumstances related to and surrounding
 6 Jacorey Shaw’s death.

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7 62. Based on all of the foregoing, accepted medical protocols hold that, based
 8 on the autopsy findings contained the the autopsy report of DR. SUNG-OOK BAIK,
 9 Jacorey Shaw did not have a heart disease and did not die as a result of cardiomyopathy.

10 63. Upon information and belief, in the 24 hour period after the autopsy was
 11 conducted, DR. SUNG-OOK BAIK and/or FRANK LEYVA and/or DOES 6-10 caused
 12 and/or allowed Mr. Shaw’s remains to severely decompose, and released the remains to
 13 the Plaintiffs’ selected mortuary on the afternoon of September 14, 2018 in a severely
 14 decomposed condition in a deliberate effort to render impossible and/or prevent any
 15 evidence of the true condition of MR. SHAW’s remains to be examined, seen, or tested
 16 by third persons.

17 **The Death Certificate**

18 64. Jacorey Shaw was pronounced dead at the SCC at 12:22 p.m. on the
 19 afternoon of **September 6, 2018**. His autopsy was conducted seven days later, on
 20 **September 13, 2018**. The autopsy report was completed and signed by DR. SUNG-OOK
 21 BAIK on **October 2, 2018**.

22 65. Inexplicably, the TUOLUMNE COUNTY Office of the Assessor Recorder
 23 did not issue the death certificate pertaining to Jacorey Shaw’s death until **April 1, 2019**,
 24 approximately seven months after Jacorey Shaw died. Upon information and belief, this
 25 extreme delay in issuing the death certificate was the result of the INDIVIDUAL
 26 DEFENDANTS, working in concert with DOES 1-10 to falsify, distort, and obfuscate
 27 the true circumstances surrounding Mr. Shaw’s death at the SCC.

28 66. The actual death certificate that was finally issued on April 1, 2019, a true

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1 and correct copy of which is attached herein, was inexplicably not signed by BILL
2 POOLEY, who was the elected TUOLOMNE COUNTY SHERIFF-CORONER during
3 this time period. Rather, the death certificate was signed and executed by two sworn
4 peace officers originally hired with the TUOLUMNE COUNTY SHERIFF'S
5 DEPARTMENT, and later purportedly employed in the capacity as "Deputy Coroners",
6 including OLIVER IMLACH and RODNEY HOBBS, neither of whom have any formal
7 medical training which would allow them to practice medicine and/or forensic
8 pathology.

9 67. Upon information and belief, at all relevant times, RODNEY HOBBS and
10 OLIVER IMLACH were directly supervised by, acting at the behest of, and under the
11 actual and apparent authority of TUOLOMNE COUNTY SHERIFF-CORONER BILL
12 POOLEY. Upon information and belief, prior to September 6, 2018, BILL POOLEY,
13 RODNEY HOBBS, and OLIVER IMLACH had and actual, express, and/or implied
14 agreement to falsify, distort, and/or cover up the true circumstances surrounding the
15 death of any inmate who may lose his life at the SCC from heat related illnesses, heat
16 related injuries, and/or heat stroke occurring under the supervision of SCC personnel.
17 Upon information and belief, RODNEY HOBBS and OLIVER IMLACH received
18 additional financial compensation, benefits, and/or other forms of valuable consideration
19 for the specialized work that RODNEY HOBBS and OLIVER IMLACH performed at
20 the behest of TUOLOMNE COUNTY SHERIFF-CORONER BILL POOLEY.

21 68. The official death certificate, which was finally issued on April 1, 2019, was
22 certified and signed by RODNEY HOBBS and OLIVER IMLACH, both of whom have
23 no connection to the medical profession whatsoever, and instead were sworn peace
24 officers employed by, and acting in the course and scope of their employment with the
25 office of the TUOLOMNE COUNTY SHERIFF-CORONER. The final certified death
26 certificate lists Jacorey Shaw's death as being associated with a "FATAL CARDIAC
27 ARRHYTHMIA". Also listed on the death certificate certified and signed by RODNEY
28 HOBBS and OLIVER IMLACH, is "ARTERIOSCLEROTIC CORONARY ARTERY"

1 and the word "OBESITY". The death certificate further classifies Mr. Shaw's death as
2 being "NATURAL".

3 69. The death certificate was fraudulent, in that it was intended by ALL
4 INDIVIDUAL DEFENDANTS to set forth the wrong cause and manner of death. ALL
5 INDIVIDUAL DEFENDANTS knew that in reality, Jacorey Shaw's death was caused by
6 and directly related to, the combined effects of heat exhaustion, heat related illnesses
7 and/or heat stroke, each of which are medical etiologies that had their inception during
8 the PFT occurring on the morning of September 6, 2019, as opposed to any kind of
9 preexisting heart disease that predated September 6, 2019.

10 **The SCC's Injury and Illness Program**

11 70. Prior to September 6, 2018, the CDCR had implemented specific policies,
12 procedures, and regulations that had the express purpose of identifying and correcting
13 hazards posed by heat related illnesses to inmates housed at CDCR facilities, including
14 the SCC, who may be at risk to the health hazards caused by prolonged exposure to
15 excessive ambient temperatures. The CDCR's regulations involved the implementation
16 of seasonal safety measures designed to (1) recognize the specific identifiers of heat
17 related illnesses and inmates that are uniquely susceptible to the health hazards
18 associated with heat exposure, and (2) implement workable safety protocols in CDCR
19 correctional facilities to protect the inmate population from being exposed to such health
20 hazards.

21 71. All of the events that occurred on the morning of September 6, 2018,
22 culminating in Jacorey Shaw's totally preventable death, demonstrate that Jacorey Shaw
23 was subjected to precisely the exact kind of health risks that the CDCR's seasonal safety
24 regulations were designed to prevent and protect inmates from having to endure. It
25 follows the events which culminated in Mr. Shaw's death demonstrate that the SCC
26 either deliberately failed to implement the CDCR's safety regulations, or that the SCC
27 did not know that such safety regulations existed.

28 72. Documents first received the plaintiffs in March of 2021, which were

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1 contained in the above mentioned Cal/OSHA investigative materials, demonstrate that
2 the former is true, as the Cal/OSHA investigation revealed a series of detailed
3 documents, several of which were signed, and apparently authored, by SCC supervisor
4 H.B. ANGELA on January 4, 2018, several months before the death of Mr. Shaw.
5 Documents detailing the SCC's injury and illness program contained lofty policy
6 statements recognizing the health hazards associated with heat related pathologies, and
7 further outlined specific procedures to be followed by SCC personnel which were
8 specifically tailored to adhere to the CDCR's mandate to (1) recognize and (2)
9 implement specific safety protocols aimed at protecting inmates from the health hazards
10 associated with heat related illnesses in warmer months. The SCC's injury and illness
11 program even had specific procedures to be followed by the SCC staff when the ambient
12 temperature exceeded 90°F at the SCC, each of which were designed to ensure that the
13 inmate population would be adequately hydrated and kept out of the sun for prolonged
14 periods of time. The problem in this case is that, notwithstanding the existence of wide
15 ranging safety protocols that, if implemented, would have protected Mr. Shaw's health
16 and prevented his death, the SCC supervisors H.B. ANGELA, PATRICIA QUINN, and
17 JERRY LINDSEY deliberately failed to implement any of the procedures in their own
18 written injury and illness programs, and consequently, coach Dennis Jordan-Curasi failed
19 to follow any of the rules set forth in the SCC's injury and illness program. The result of
20 this failure to implement these safety protocols is that Jacorey Shaw was made to endure
21 approximately two and one-half hours of rigorous physical exertion without adequate
22 hydration and without being in a shaded area as the ambient temperature climbed to well
23 over 90°F. This is why Mr. Shaw died.

24 ///

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28 ///

FOR THE FIRST CAUSE OF ACTION

(By ALL PLAINTIFFS, as Successors in Interest to Jacorey Shaw, deceased
Against ADAM CHRISTIANSON, BILL POOLEY, SUNG-OOK BAIK,
M.D., FRANK LEYVA, RODNEY HOBBS, OLIVER IMLACH, H.B.
ANGELA, PATRICIA QUINN, JERRY LINDSEY, TIMOTHY
MCCARTHY, and [REDACTED] (Hereinafter Collectively
Referred to as “INDIVIDUAL DEFENDANTS”) and DOES 1-10 for
Violations of Civil Rights [42 U.S.C. § 1985]) (Conspiracy to Violate Civil
Rights)

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73. Plaintiffs incorporate by reference the foregoing paragraphs of
this Complaint.

74. This cause of action is set forth herein to redress the deprivation, under
color of statute, ordinance, regulation, policy, custom, practice, and/or usage, of rights,
privileges, and/or immunities secured to Jacorey Shaw by the Constitution of the United
States, the provisions of which include, but are not limited to, the right to equal
protection of laws and the right to be free from cruel and unusual punishments, as
guaranteed by the Fourteenth, Eighth, and Fifth Amendments to the United States
Constitution, among other constitutional provisions.

75. At all times relevant to the acts and omissions herein alleged, the
INDIVIDUAL DEFENDANTS, and each of them, at all times acted under color of law,
and in the course and scope of their employment with their respective employers,
including the CDCR, SCC, COUNTY OF TUOLUMNE, and COUNTY OF
STANISLAUS.

76. As reflected in the foregoing paragraphs of this Complaint, the SCC
leadership staff, which included H.B. ANGELA, PATRICIA QUINN, JERRY
LINDSAY, and DOES 1-5 deliberately failed to implement any safety measures aimed at
protecting the health and safety of inmates that endured the uniquely arduous testing day
exertions, which exposed Mr. Shaw to prolonged physical exertion and dehydration in

1 heat that surpassed 90°F, proximately causing Mr. Shaw's totally preventable death.
 2 Thereafter, pursuant to an express and/or implied agreement which predated September
 3 6, 2018, each of the INDIVIDUAL DEFENDANTS, acting separately and in concert,
 4 deliberately obfuscated the true circumstances surrounding Mr. Shaw's death in various
 5 ways, and conspired to falsely ascribe Mr. Shaw's death to a preexisting heart disease, in
 6 a manner that furthered no rational governmental objective or purpose.

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7 77. In connection with the above described events, SCC supervisors H.B.
 8 ANGELA, PATRICIA QUINN, JERRY LINDSAY, and DOES 1-5 deliberately and
 9 consciously denied the equal protection of the laws in a manner that furthered no rational
 10 governmental objective or purpose, to the following classes of persons, each of whom
 11 included Jacorey Shaw, as follows:

- 12 a. By being denied the benefit of safety protocols aimed at preventing heat
 13 related illnesses, inmates at the SCC were denied the equal protection of the
 14 laws, as compared to other similarly situated inmates at other CDCR
 15 facilities located in areas in which seasonal heat in warmer months could
 16 expose such inmates to the risk of heat related injuries and illnesses.
- 17 b. By having endure an unsafe, untested, and uniquely hazardous additional
 18 prolonged exercise requirement in extreme heat at the conclusion of the
 19 time in which the test day exercises had historically ended, inmates involved
 20 in Jacorey Shaw's PFT class were denied the equal protection of the laws,
 21 as compared to other similarly situated inmates in other PFT classes within
 22 the SCC.

23 78. The decision making process that resulted in the above referenced denials of
 24 equal protection of the laws was deliberately undertaken, and consciously chosen among
 25 other considered alternatives, by H.B. ANGELA, PATRICIA QUINN, JERRY
 26 LINDSAY, and DOES 1-5. Thereafter, pursuant to an express and/or implied agreement
 27 which predated September 6, 2018, each of the INDIVIDUAL DEFENDANTS, acting
 28 separately and in concert, made possible the above referenced denials of equal protection

1 of the laws by ensuring there would be no accountability for these civil rights violations
 2 by deliberately falsifying, obfuscating, and covering up the true circumstances
 3 surrounding Mr. Shaw's death in various ways, ultimately conspiring to falsely ascribe
 4 Mr. Shaw's death to a preexisting heart disease which the INDIVIDUAL
 5 DEFENDANTS, and each of them, knew was false.

6 79. Upon information and belief, H.B. ANGELA, PATRICIA QUINN, JERRY
 7 LINDSAY, and DOES 1-5, would not have undertaken the acts and omissions which
 8 denied Jacorey Shaw the equal protection of the laws had they not known that they
 9 would be absolved of any accountability for their actions. Put another way, the above
 10 referenced civil rights violations were made possible because, prior to undertaking the
 11 unconstitutional acts and omissions referenced herein, H.B. ANGELA, PATRICIA
 12 QUINN, JERRY LINDSAY, and DOES 1-5 knew that they could violate Mr. Shaw's
 13 civil rights, as well as the civil rights of any other similarly situated inmate, with the full
 14 knowledge that the rest of the INDIVIDUAL DEFENDANTS would protect them and
 15 cover up their unconstitutional acts and omissions.

16 80. As a direct and proximate result of the wrongful, intentional, and malicious
 17 acts and omissions of the individual defendant, Plaintiffs' decedent, Jacorey Shaw,
 18 suffered great mental and physical pain, suffering, anguish, fright, nervousness, anxiety,
 19 grief, shock, humiliation, indignity, embarrassment, and apprehension prior to his death,
 20 all to his damage in a sum to be determined at trial.

21 81. Plaintiffs are informed, believe, and thereupon allege, that in
 22 unreasonably causing the death of Plaintiffs' decedent as described herein, the
 23 INDIVIDUAL DEFENDANTS acted willfully, maliciously, knowingly, with reckless
 24 disregard and callous indifference to the known consequences of their acts and
 25 omissions, and purposefully with the intent to deprive Jacorey Shaw of his federally
 26 protected rights and privileges, and did in fact violate the aforementioned rights and
 27 privileges, thereby warranting punitive and exemplary damages against the individual
 28 defendant in an amount to be proven at trial.

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82. Plaintiffs are entitled to and hereby demands costs, attorneys' fees, and expenses pursuant to 42 U.S.C. § 1988.

FOR THE SECOND CAUSE OF ACTION

(By ALL PLAINTIFFS, as Successors in Interest to Jacorey Shaw, deceased, Against ALL INDIVIDUAL DEFENDANTS and DOES 1-10 for Violations of Civil Rights [42 U.S.C. § 1986]) (Failure to Prevent Conspiracy to Violate Civil Rights)

83. Plaintiffs incorporate by reference the foregoing paragraphs of this Complaint.

84. At all times relevant to the acts and omissions herein alleged, the INDIVIDUAL DEFENDANTS, and each of them, at all times acted under color of law, and in the course and scope of their employment with their respective employers, including the CDCR, SCC, COUNTY OF TUOLUMNE, and COUNTY OF STANISLAUS.

85. Prior to September 6, 2018, ALL INDIVIDUAL DEFENDANTS, and each of them, had knowledge of the deliberate failure among the SCC supervisory staff members to deny SCC inmates safety protocols aimed at the prevention of heat related injuries and illnesses in a manner that violated the civil rights of SCC inmates by denying them the equal protection of the laws, as described above, and/or had direct knowledge of the actual, express, and/or implied agreement among ALL INDIVIDUAL DEFENDANTS to falsify, distort, and/or cover up the true circumstances surrounding the death of any inmate who may lose his life at the SCC from heat related illnesses, heat related injuries, and/or heat stroke occurring under the supervision of SCC personnel. Notwithstanding this knowledge ALL INDIVIDUAL DEFENDANTS, each of whom had the power to prevent or aid in preventing the commission of the above mentioned conspiracy to violate the civil rights of SCC inmates, including Jacorey Shaw, deliberately refused to take any actions to prevent the civil rights violations referenced herein, which ultimately caused the death of Jacorey Shaw.

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86. As a direct and proximate result of the wrongful, intentional, and malicious acts and omissions of the individual defendant, Plaintiffs' decedent, Jacorey Shaw, suffered great mental and physical pain, suffering, anguish, fright, nervousness, anxiety, grief, shock, humiliation, indignity, embarrassment, and apprehension prior to his death, all to his damage in a sum to be determined at trial.

87. Plaintiffs are informed, believe, and thereupon allege, that in unreasonably causing the death of Jacorey Shaw as described herein, the INDIVIDUAL DEFENDANTS acted willfully, maliciously, knowingly, with reckless disregard and callous indifference to the known consequences of their acts and omissions, and purposefully with the intent to deprive Plaintiffs' decedent of his federally protected rights and privileges, and did in fact violate the aforementioned rights and privileges, thereby warranting punitive and exemplary damages against the INDIVIDUAL DEFENDANTS in an amount to be proven at trial.

88. Plaintiffs are entitled to and hereby demands costs, attorneys' fees, and expenses pursuant to 42 U.S.C. § 1988.

FOR THE THIRD CAUSE OF ACTION

(By PLAINTIFFS HOPE MCGEE and PAUL SHAW Against ADAM CHRISTIANSON, BILL POOLEY, SUNG-OOK BAIK, M.D., H.B. ANGELA, PATRICIA QUINN, JERRY LINDSEY, and DOES 1-10 for Violations of Civil Rights [42 U.S.C. § 1983]) (Supervisory Liability for Civil Rights Violations)

89. Plaintiffs incorporate by reference the foregoing paragraphs of this Complaint.

90. In conspiring to violate Mr. Shaw's civil rights, as described in the foregoing paragraphs of this Complaint, SUPERVISORY DEFENDANTS ADAM CHRISTIANSON, BILL POOLEY, SUNG-OOK BAIK, M.D., H.B. ANGELA, PATRICIA QUINN, JERRY LINDSEY, and DOES 1-5, actively deprived, and directed the deprivation of Jacorey Shaw's civil rights, including those secured to him by the

1 Constitution of the United States and the laws of the United States, including, but not
 2 limited to, the Eighth Amendment's right to be free from cruel and unusual punishment,
 3 and the right to equal protection of laws, as guaranteed by the Fourteenth and Fifth
 4 Amendments to the United States Constitution.

5 91. As described in the foregoing paragraphs of this Complaint,
 6 SUPERVISORY DEFENDANTS ADAM CHRISTIANSON, BILL POOLEY, SUNG-
 7 OOK BAIK, M.D., H.B. ANGELA, PATRICIA QUINN, JERRY LINDSEY, and DOES
 8 1-5 subjected Jacorey Shaw to the above described civil rights violations, which denied
 9 him the equal protection of the laws and subjected him to cruel and unusual punishment.

10 92. As a direct and proximate result of the wrongful, intentional, and malicious
 11 acts and omissions of these defendants, Plaintiffs' decedent, Jacorey Shaw, suffered
 12 great mental and physical pain, suffering, anguish, fright, nervousness, anxiety, grief,
 13 shock, humiliation, indignity, embarrassment, and apprehension prior to his death, all to
 14 his damage in a sum to be determined at trial.

15 93. Plaintiffs are informed, believe, and thereupon allege, that in
 16 unreasonably causing the death of Plaintiffs' decedent as described herein,
 17 SUPERVISORY DEFENDANTS ADAM CHRISTIANSON, BILL POOLEY, SUNG-
 18 OOK BAIK, M.D., H.B. ANGELA, PATRICIA QUINN, JERRY LINDSEY, and DOES
 19 1-5 acted willfully, maliciously, knowingly, with reckless disregard and callous
 20 indifference to the known consequences of their acts and omissions, and purposefully
 21 with the intent to deprive Plaintiffs' decedent of his federally protected rights and
 22 privileges, and did in fact violate the aforementioned rights and privileges, thereby
 23 warranting punitive and exemplary damages against the individual defendant in an
 24 amount to be proven at trial.

25 94. Plaintiffs are entitled to and hereby demands costs, attorneys' fees, and
 26 expenses pursuant to 42 U.S.C. § 1988.

27 / / /

28 / / /

THE
 COCHRAN
 FIRM
 CALIFORNIA
 4929 Wilshire Bl.
 Suite 1010
 (323)435-8205

FOR THE FOURTH CAUSE OF ACTION

**(By PLAINTIFFS HOPE MCGEE and PAUL SHAW Against THE
COUNTY OF TUOLUMNE And THE COUNTY OF STANISLAUS,
Municipal Liability Based on the Unconstitutional Failure to Train)**

95. Plaintiffs incorporate by reference the foregoing paragraphs of
this Complaint.

96. As set forth herein, the INDIVIDUAL DEFENDANTS, while acting under
color of law, violated the rights, privileges, and/or immunities secured to Jacorey Shaw
by the Constitution of the United States, the provisions of which include, but are not
limited to, the right to equal protection of laws and the right to be free from cruel and
unusual punishments, as guaranteed by the Fourteenth, Eighth, and Fifth Amendments to
the United States Constitution, among other constitutional provisions.

97. As thoroughly described herein, prior to September 6, 2018, ALL
INDIVIDUAL DEFENDANTS, and each of them, had knowledge of the deliberate
failure among the SCC supervisory staff members to deny SCC inmates safety protocols
aimed at the prevention of heat related injuries and illnesses in a manner that violated the
civil rights of SCC inmates by denying them the equal protection of the laws, as
described above, and/or had direct knowledge of the actual, express, and/or implied
agreement among ALL INDIVIDUAL DEFENDANTS to falsify, distort, and/or cover
up the true circumstances surrounding the death of any inmate who may lose his life at
the SCC from heat related illnesses, heat related injuries, and/or heat stroke occurring
under the supervision of SCC personnel.

98. In furthering the conspiratorial deprivations of civil rights referenced herein,
SUPERVISORY DEFENDANTS ADAM CHRISTIANSON, BILL POOLEY, and
SUNG-OOK BAIK, M.D., and DOES 6-10 deliberately failed to train all persons
employed by the COUNTY OF TUOLUMNE and the COUNTY OF STANISLAUS as
to how to properly investigate the circumstances surrounding the in-custody deaths at the
SCC, as well as how to objectively investigate and conduct autopsies, and certify death

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certificates, in a scientifically neutral and unbiased manner, without having a predetermined cause of death designed to absolve government officials of liability as the primary factor controlling and directing every aspect of the investigation of events, performance of autopsies, and certification of death certificates.

99. As a direct and proximate result of the wrongful, intentional, and malicious acts and omissions of these defendants, Plaintiffs' decedent, Jacorey Shaw, suffered civil rights violations prior to his death, and suffered great mental and physical pain, suffering, anguish, fright, nervousness, anxiety, grief, shock, humiliation, indignity, embarrassment, and apprehension prior to his death, in a sum to be determined at trial.

100. Plaintiffs are entitled to and hereby demands costs, attorneys' fees, and expenses pursuant to 42 U.S.C. § 1988.

FOR THE FIFTH CAUSE OF ACTION

(By PLAINTIFFS HOPE MCGEE and PAUL SHAW Against ALL INDIVIDUAL DEFENDANTS and DOES 1-10 for Violations of Civil Rights [42 U.S.C. § 1983])(Based on Substantive Due Process Violations)

101. Plaintiffs incorporate by reference the foregoing paragraphs of this Complaint as if set forth in full at this point.

102. This cause of action is set forth herein to redress the deprivation, under color of statute, ordinance, regulation, policy, custom, practice, and/or usage, of rights, privileges, and/or immunities secured to Plaintiffs Jacorey Shaw, by the Fourteenth Amendment to the Constitution of the United States, including, but not limited to, the right to be free from state actions that would deprive Plaintiffs and their birth son of life, liberty, or property in such a manner as to constitute and unreasonable interference into their familial relationship, and in a manner that shock the conscience,

103. At all times mentioned herein, the INDIVIDUAL DEFENDANTS, and each of them, acted under color and pretense of law, and under color of the statutes, ordinances, regulations, policies, practices, customs, and/or usages of the State of

California, the CDCR, and the Sierra Conservation Center. In so doing, the INDIVIDUAL DEFENDANTS deprived Plaintiffs' decedent, Jacorey Shaw, of the rights, privileges, and/or immunities secured to him by the Constitution of the United States and the laws of the United States, including, but not limited to, the Eighth Amendment's right to be free from cruel and unusual punishment, and the right to equal protection of the laws, as guaranteed by the Fourteenth and Fifth Amendments to the United States Constitution.

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104. Plaintiffs are informed, believe, and thereupon allege, that in unreasonably causing the death of Plaintiffs' decedent as described herein, the INDIVIDUAL DEFENDANTS, despite having deliberative opportunities to consider alternative courses of action, acted willfully, maliciously, knowingly, with reckless disregard and callous indifference to the known consequences of their acts and omissions, and purposefully with the intent to deprive Plaintiffs' decedent of his federally protected rights and privileges in a manner that shocks the conscience, and did in fact violate the aforementioned rights and privileges, thereby warranting punitive and exemplary damages against the individual defendant in an amount to be proven at trial.

105. Plaintiffs are entitled to and hereby demands costs, attorneys' fees, and expenses pursuant to 42 U.S.C. § 1988.

FOR THE SIXTH CAUSE OF ACTION

(By PLAINTIFFS HOPE MCGEE and PAUL SHAW, as Successors in Interest to Jacorey Shaw, deceased, Against ALL INDIVIDUAL DEFENDANTS and DOES 1-10 for Violations of Civil Rights [42 U.S.C. § 1983])(Based on Unconstitutional Denial of Medical Care)

106. Plaintiffs incorporate by reference the foregoing paragraphs of this Complaint.

107. This cause of action is set forth herein to redress the deprivation, under color of statute, ordinance, regulation, policy, custom, practice, and/or usage, of rights, privileges, and/or immunities secured to Plaintiffs' decedent, Jacorey Shaw, by the

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1 Eighth Amendment to the Constitution of the United States, including, but not limited to,
2 the right to be free from cruel and unusual punishments.

3 108. During the course of the PFT, which occurred during the daylight hours on
4 an extremely hot day, Jacorey Shaw was exhibiting the obvious signs of a medical
5 emergency, which included, but were not limited to, the objective symptoms of
6 dehydration, extreme fatigue, heat exhaustion, and other related conditions indicating
7 that Jacorey Shaw was suffering from a severe and life threatening medical emergency
8 prior to his collapse at 11:08 a.m. on September 6, 2018. The fact that Mr. Shaw was
9 suffering from a severe and life threatening medical emergency was or should have been
10 apparent to the INDIVIDUAL DEFENDANTS, and/or those who conspired with a
11 common plan and purpose to the INDIVIDUAL DEFENDANTS, and should have been
12 apparent to reasonably well trained persons in position(s) similarly situated to
13 INDIVIDUAL DEFENDANTS H.B. ANGELA, PATRICIA QUINN, JERRY
14 LINDSEY, TIMOTHY MCCARTHY, ___[NAME REDACTED]___, and DOES 1-5, and
15 those INDIVIDUAL DEFENDANTS who conspired with these defendants with a
16 common plan and purpose. At all times relevant to the acts and omissions herein alleged,
17 Jacorey Shaw was in custody, was under the exclusive care and control of The CDCR
18 and the SCC, and had a special relationship to the employees of the these defendants,
19 including H.B. ANGELA, PATRICIA QUINN, JERRY LINDSEY, TIMOTHY
20 MCCARTHY, ___[NAME REDACTED]___, and DOES 1-5 concerning the care and control
21 of all aspects of his physical health and well being.

22 109. As a direct and proximate result of the wrongful, intentional, and malicious
23 acts and omissions of these defendants, Plaintiffs' decedent, Jacorey Shaw, suffered civil
24 rights violations prior to his death, and suffered great mental and physical pain,
25 suffering, anguish, fright, nervousness, anxiety, grief, shock, humiliation, indignity,
26 embarrassment, and apprehension prior to his death, in a sum to be determined at trial.

27 110. Plaintiffs are entitled to and hereby demands costs, attorneys' fees, and
28 expenses pursuant to 42 U.S.C. § 1988.

FOR THE SEVENTH CAUSE OF ACTION

(By PLAINTIFFS HOPE MCGEE and PAUL SHAW, As Successors in Interest to Jacorey Shaw, deceased, Against ALL INDIVIDUAL DEFENDANTS for Violations of Civil Rights [42 U.S.C. § 1983])(Based on Unconstitutional Failure to Protect)

111. Plaintiffs restates and incorporate by reference the foregoing paragraphs of this Complaint as if set forth in full at this point.

112. This cause of action is set forth herein to redress the deprivation, under color of statute, ordinance, regulation, policy, custom, practice, and/or usage, of rights, privileges, and/or immunities secured to Plaintiffs and Plaintiffs' decedent, Jacorey Shaw, by the Eighth Amendment to the Constitution of the United States, including, but not limited to, the right to be free from cruel and unusual punishments, and the right to the equal protection of laws, as guaranteed by the Fourteenth and Fifth Amendments to the Constitution of the United States.

113. At all times relevant to the acts and omissions herein alleged, the INDIVIDUAL DEFENDANTS, and each of them, at all times acted under color of law, and in the course and scope of their employment with their respective employers, including the CDCR, SCC, COUNTY OF TUOLUMNE, and COUNTY OF STANISLAUS.

114. Based on the above alleged conduct, ALL INDIVIDUAL DEFENDANTS knew, or should have known, or conspired with a common mind and purpose with INDIVIDUAL DEFENDANTS who knew, or should have known, that prior to his collapse at 11:08 a.m. on September 6, 2018, that Jacorey Shaw faced a serious medical need, and knowingly disregarded this medical need by failing to take reasonable measures to address it, proximately causing significant pain and suffering, and death, to Jacorey Shaw, in violation of his right to be free from cruel and unusual punishment, and his right to the equal protection of laws, as described herein.

115. As a direct and proximate result of the wrongful, intentional, and malicious acts and omissions of the individual defendant, Plaintiffs' decedent, JACOREY SHAW,

suffered great mental and physical pain, suffering, anguish, fright, nervousness, anxiety, grief, shock, humiliation, indignity, embarrassment, and apprehension prior to his death, all to his damage in a sum to be determined at trial.

116. Plaintiffs are entitled to and hereby demands costs, attorneys' fees, and expenses pursuant to 42 U.S.C. § 1988.

WHEREFORE, Plaintiff prays for judgment against Defendants as follows:

1. For general and special damages in an amount according to proof at trial;
2. For past and future loss of wages and/or earnings and/or earning capacity according to proof at trial;
3. For costs of suit incurred herein;
4. For attorneys' fees incurred herein, as provided by law;
5. For punitive damages against the individual Defendants in their individual capacities in an amount according to proof at trial; and
6. For such other and further relief as the Court deems just and proper.

JURY DEMAND

Plaintiff hereby demands that a jury be impaneled for the trial of this matter.

DATED: April 21, 2021

Respectfully submitted,

THE COCHRAN FIRM CALIFORNIA

By /s/ Brian T. Dunn

BRIAN T. DUNN

Attorneys for Plaintiffs

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DECLARATION OF HOPE MAGEE

1
2 1. The decedent's name who is the subject of this action for wrongful death is
3 JACOREY SHAW.

4 2. On September 6, 2018, JACOREY SHAW lost his life as a result of civil rights
5 violations contributing to his death at the Sierra Conservation Center, located at 5100 O'Byrnes
6 Ferry Road in Jamestown, California.

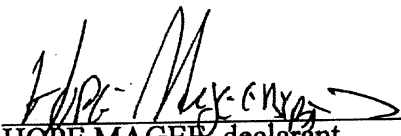
7 3. No proceeding is now pending in California for the administration of the
8 decedent's estate.

9 4. I am the decedent's successor in interest (as defined in Section 377.11 of the
10 California Code of Civil Procedure) with respect to the decedent's interest in the within action.

11 5. No other person has a superior right to commence the action or proceeding or to
12 be substituted for the decedent in the pending action.

13 I declare under penalty of perjury under the laws of the State of California that the
14 foregoing is true and correct.

15
16 DATED: September 11, 2019


HOPE MAGEE, declarant

DECLARATION OF PAUL SHAW

1
2 1. The decedent's name who is the subject of this action for wrongful death is
3 JACOREY SHAW.

4 2. On September 6, 2018, JACOREY SHAW lost his life as a result of civil rights
5 violations contributing to his death at the Sierra Conservation Center, located at 5100 O'Byrnes
6 Ferry Road in Jamestown, California.

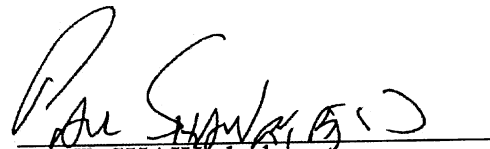
7 3. No proceeding is now pending in California for the administration of the
8 decedent's estate.

9 4. I am the decedent's successor in interest (as defined in Section 377.11 of the
10 California Code of Civil Procedure) with respect to the decedent's interest in the within action.

11 5. No other person has a superior right to commence the action or proceeding or to
12 be substituted for the decedent in the pending action.

13 I declare under penalty of perjury under the laws of the State of California that the
14 foregoing is true and correct.

15
16 DATED: September 11, 2019


PAUL SHAW, declarant

CERTIFICATE OF DEATH

3201855000468

* 0 0 0 1 3 3 7 4 1 *

DATE ISSUED 4/1/2019

This copy is not valid unless prepared on an engraved border, displaying the date, seal, and signature of the Assessor-Recorder.

ANY ALTERATION OR ERASURE VOIDS THIS CERTIFICATE



CERTIFICATION OF VITAL RECORD

OFFICE OF ASSESSOR - RECORDER

COUNTY OF TUOLUMNE

SONORA, CALIFORNIA

PHYSICIAN/CORONER'S AMENDMENT

3052018191987

STATE FILE NUMBER

1,1

NO ERASURES, WHITEOUTS, PHOTOCOPIES,
OR ALTERATIONS

3201855000468

LOCAL REGISTRATION NUMBER

☐ BIRTH ☒ DEATH ☐ FETAL DEATH

TYPE OR PRINT CLEARLY IN BLACK INK ONLY - THIS AMENDMENT BECOMES AN ACTUAL PART OF THE OFFICIAL RECORD

PART I INFORMATION TO LOCATE RECORD

INFORMATION AS IT APPEARS ON ORIGINAL RECORD	1A. NAME - FIRST JACOREY	1B. MIDDLE MICHAEL	1C. LAST SHAW	2. SEX M
	3. DATE OF EVENT - MM/DD/YYYY 09/06/2018	4. CITY OF EVENT RURAL JAMESTOWN	5. COUNTY OF EVENT TUOLUMNE	

PART II STATEMENT OF CORRECTIONS

6. CERTIFICATE ITEM NUMBER	7. INFORMATION AS IT APPEARS ON ORIGINAL RECORD	8. INFORMATION AS IT SHOULD APPEAR
107A	PENDING	FATAL CARDIAC ARRHYTHMIA
107AT		MINS
107B		ARTERIOSCLEROTIC CORONARY ARTERY
107BT		YRS
112		OBESITY
113		NONE
119	PENDING INVESTIGATION	NATURAL

DECLARATION
OF
CERTIFYING
PHYSICIAN OR
CORONER

I HEREBY DECLARE UNDER PENALTY OF PERJURY THAT THE ABOVE INFORMATION IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE.

9. SIGNATURE OF CERTIFYING PHYSICIAN OR CORONER

RODNEY D HOBBS

10. DATE SIGNED - MM/DD/YYYY

01/29/2019

11. TYPED OR PRINTED NAME AND TITLE/DEGREE OF CERTIFIER

DEPUTY CORONER

12. ADDRESS - STREET AND NUMBER

28 NORTH LOWER SUNSET DRIVE

13. CITY

SONORA

14. STATE

CA

15. ZIP CODE

95370

STATE/LOCAL
REGISTRAR
USE ONLY

16. OFFICE OF VITAL RECORDS OR LOCAL REGISTRAR

STATE REGISTRAR - OFFICE OF VITAL RECORDS

17. DATE ACCEPTED FOR REGISTRATION - MM/DD/YYYY

01/29/2019

STATE OF CALIFORNIA, DEPARTMENT OF PUBLIC HEALTH, OFFICE OF VITAL RECORDS

020101004108022

FORM VS 24As (REV. 1/04)

1,1

This is a true and exact reproduction of the document officially registered and placed on file in the office of the Tuolumne County Assessor-Recorder.

KAREN WHITMAN

TUOLUMNE COUNTY ASSESSOR-RECORDER

DATE ISSUED

4/1/2019

This copy is not valid unless prepared on an engraved binder, displaying the date, seal and signature of the Assessor-Recorder.
PRINTED ONLY SIDE

ANY ALTERATION OR ERASURE VOIDS THIS CERTIFICATE